

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MASSACHUSETTS FAIR HOUSING
CENTER; INTERMOUNTAIN FAIR
HOUSING COUNCIL; SAN ANTONIO
FAIR HOUSING COUNCIL, INC., d/b/a
FAIR HOUSING COUNCIL OF SOUTH
TEXAS; and HOUSING RESEARCH AND
ADVOCACY CENTER, d/b/a FAIR
HOUSING CENTER FOR RIGHTS &
RESEARCH, INC., *on behalf of themselves
and all those similarly situated,*

Plaintiffs,

v.

THE DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT; SCOTT
TURNER, *in his official capacity as
Secretary of Housing and Urban
Development*; U.S. DOGE SERVICE; U.S.
DOGE SERVICE TEMPORARY
ORGANIZATION; and AMY GLEASON, *in
her official capacity as Acting Administrator
of U.S. DOGE Service and U.S. DOGE
Service Temporary Organization,*

Defendants.

Civil Action No. 3:25-CV-30041-RGS

DECLARATION OF MAUREEN ST. CYR

I, Maureen St. Cyr, declare the following under penalties of perjury:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information and belief.

2. I am the Executive Director of Massachusetts Fair Housing Center (“MFHC”), a non-profit organization located in Holyoke, MA.
3. MFHC is funded to serve residents of Central and Western Massachusetts, in significant part, through FHIP grants.
4. In order to receive funds under FHIP grants, MFHC is in regular communication and engagement with staff in the Region I office of the U.S. Department of Housing and Urban Development (HUD), including its Government Technical Representative (GTR).
5. More specifically, prior to the start of the grant period, and prior to the start of each subsequent grant year, MFHC engages with its GTR regarding the grant deliverables MFHC commits to perform, as well as the basis of the grant performance and a schedule for payment.
6. Once negotiations are finalized, MFHC is then obliged to undertake and achieve these grant deliverables and report on those deliverables to HUD.
7. Grant administration is broken into quarters. At the end of each quarter, MFHC submits a “quarterly report” detailing the work it has performed during the prior three months.
8. The assigned GTR then reviews MFHC’s quarterly report and then issues its own report, the “GTR report,” in which HUD details its analysis of MFHC’s progress on its deliverables.
9. HUD then issues a Payment Approval Form and disburses the money for the prior three months’ work that it deems eligible for payment.
10. At no point are we entitled to simply invoice HUD and expect remuneration. As the FHIP manual makes clear:

[D]isbursements are based on the GTR’s/GTM’s acceptance of all required work products. When the GTR/GTM has reviewed the final quarterly report, the GTM will convey any deficiencies to the grantee that must be addressed prior to submission of the final report. The grantee has 90 calendar days after the date completion of the award, or

after any deficiencies are noted, to submit the final report covering the entire performance period. Upon receipt of the final report, the GTR/GTM will review to: a. assess overall performance of the grantee and b. determine whether the grantee performance was outstanding, satisfactory, fair or poor. The GTR/GTM will identify tasks in which the grantee exceeded or failed to meet grant requirements and rate the grantee accordingly. The GTR's assessment considers the timeliness, quality and quantity of grantee work products throughout the life of the grant. If the grantee's performance is poor, the grantee is precluded from receiving further FHIP funds until the issues causing the poor performance are cleared up to the GO's satisfaction.

Application and Award Policies and Procedures Guide for FHIP Grantees, September 2017, pg.

88, available at

<https://www.hud.gov/sites/dfiles/FHEO/documents/APP%20Guide%205.17.17mpn.pdf>.

11. In addition to review of its quarterly reports, MFHC is monitored by HUD on an annual basis to ensure compliance with grant terms. Monitoring consists of completion of a series of checklists provided to MFHC by the GTR requesting information relating to MFHC's financial systems, overall management, and grant activities.
12. Following completion of the checklists, MFHC staff meet with the GTR, generally at the MFHC office to discuss grant compliance, MFHC's systems and activities, and to discuss any concerns and questions either party may have about the past year or the upcoming year.
13. MFHC is also in regular communication with its GTR throughout the grant term on an ad hoc basis and is able to reach out to discuss questions. For example, MFHC may reach out to its GTR to make a revision to its deliverables or its budget, if a change in staffing occurs, or if new information suggests that a deliverable may be more effectively accomplished in a different manner. The GTR works with us to resolve these questions.

14. The process I described above continues for the life of the grant. For example, MFHC's grant lasts for 36 months, commencing on June 1, 2023 and ending on May 31, 2026. When that grant was reinstated on March 26, 2025, we immediately communicated with our GTR to re-launch the process that had been abruptly terminated on February 27, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 10, 2025

A handwritten signature in black ink, appearing to be 'M. St. Cyr', written above a horizontal line.

Maureen St. Cyr